

FILED  
Clerk  
District Court

APR 10 2006

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

**KRISTIN D. ST. PETER**  
**Assistant Attorney General**  
**Commonwealth of the Northern Mariana Islands**  
**Office of the Attorney General-Civil Division**  
**2<sup>nd</sup> Floor, Hon. Juan A. Sablan Memorial Bldg.**  
**Caller Box 10007**  
**Saipan, MP 96950**

**Attorney for: Defendants CNMI, Forelli, Bush, Cotton and Brown**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW,

Plaintiff,

vs.

COMMONWEALTH OF THE NORTHERN  
MARIANA ISLANDS, NICOLE C. FORELLI,  
WILLIAM C. BUSH, D. DOUGLAS COTTON,  
L. DAVID SOSEBEE, ANDREW CLAYTON,  
UNKNOWN AND UNNAMED PERSONS IN  
THE CNMI OFFICE OF THE ATTORNEY  
GENERAL, ALEXANDRO C. CASTRO, JOHN  
A. MANGLONA, TIMOTHY H. BELLAS,  
PAMELA BROWN, ROBERT BISOM, AND  
JAY H. SORENSEN,

Defendants.

Case No. 05-0027

**EX PARTE MOTION EXTENDING TIME  
UNDER LOCAL RULE 7.1.h.3(b) AND  
FED. R. CIV. P. 6 (b); APPLICATION FOR  
INCREASE OF TIME UNDER LOCAL  
RULE 7.1.h.2**

**CERTIFICATE PURSUANT TO LOCAL RULE 7.1.h.3(b)**

As undersigned counsel, Kristin D. St. Peter, certifies as follow:

a. The address and phone number of Plaintiff Bradshaw, who is without counsel, as listed on his

Amended Complaint is:

1 P.O. Box 473  
2 1530 Trout Creek Road  
3 Calder, Idaho 83808  
4 Telephone: 208-245-1691

5 Defendants Commonwealth of the Northern Mariana Islands ("CNMI"), Nicole Forelli,  
6 William C. Bush, D. Douglas Cotton, and Pamela Brown are represented by the Commonwealth of the  
7 Northern Mariana Islands Attorney General's Office whose address and relevant numbers are:

8 Office of the Attorney General-Civil Division  
9 2<sup>nd</sup> Floor, Hon. Juan A. Sablan Memorial Bldg.  
10 Caller Box 10007  
11 Saipan, MP 96950  
12 Telephone: 670-664-2341  
13 Facsimile: 670-664-2349

14 Defendant Jay Sorensen's address and relevant numbers are:

15 c/o Shanghai  
16 Post Office Box 9022  
17 Warren, MI 48090-9022  
18 Telephone: (86) 21 5083-8542  
19 Facsimile: (86) 21 5083-8542

20 Mr. Sorensen is acting both in his individual capacity and as counsel for Defendant Robert  
21 Bisom.

22 Defendant Alexandro C. Castro is represented by the law firm of Civile and Tang, PLLC whose  
address and relevant numbers are:

330 Herman Cortez Ave, Suite 200  
Hagatna, Guam 96910  
Telephone: 671-472-8868  
Facsimile: 671-477-2511

The Commonwealth of the Northern Mariana Islands Attorney General's Office will most  
likely defend defendants David Sosebee and Andrew Clayton once they are properly served. At this  
time, however, there is a question as to whether proper service occurred. Defendants Sosebee and

1 Clayton intend to file individual Motions to Quash Service in the near term. Until such time as a  
2 determination regarding proper service is made, Defendants Sosebee and Clayton respectfully refuse to  
3 submit to the jurisdiction of this Court. If this Court concludes Defendants Sosebee and Clayton were  
4 properly served, then these Defendants will also file a responsive pleading or dispositive motion on or  
5 before June 19, 2006.

6 **FACTS SHOWING EXISTENCE AND NATURE OF THE CLAIMED EMERGENCY**  
7 **OR REASON FOR EX PARTE APPLICATION**

8 Defendants CNMI, Nicole Forelli, William C. Bush, D. Douglas Cotton, and Pamela Brown  
9 (hereafter collectively "Defendants") request that this Court extend and enlarge time to respond to  
10 Plaintiff's Second Amended Complaint. Specifically, Defendants seek an enlargement up to and  
11 including June 19, 2006 to file a dispositive motion or responsive pleading to the Plaintiff's Second  
12 Amended Complaint.

13 Defendants wish to proceed in an abundance of caution and move to enlarge time for filing a  
14 responsive dispositive motion under Fed. R. Civ. P. 12 (b) (6).

15 Plaintiff Bradshaw's Second Amended Complaint is seventy-five pages long and contains  
16 numerous causes of action under an exhaustive list of federal civil and criminal statutes, including,  
17 among others, the Racketeer Influence Corrupt Organizations Act, the Immigration Reform and  
18 Control Act and several Federal Civil Rights causes of action. Crafting an adequate response to all of  
19 Plaintiff Bradshaw's allegations on behalf of the four Defendants is quite an undertaking.  
20 Accordingly, Defendants need additional time to properly address Plaintiff's allegations and file a  
21 responsive pleading or dispositive motion.  
22

**PLAINTIFF BRADSHAW WAS NOTIFIED, BUT HAS YET TO BE SERVED WITH  
THIS MOTION**

The undersigned Attorney General spoke with Plaintiff Bradshaw on April 10, 2006. Mr. Bradshaw, appearing *pro se*, does not oppose this motion and agrees to enlarge time up to and including June 19, 2006. Because Mr. Bradshaw resides in Idaho, Defendants were unable to obtain a stipulation memorializing this agreement in a timely manner.

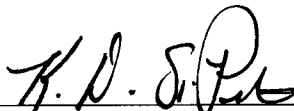
**APPLICATIONS TO INCREASE TIME PURSUANT TO LOCAL RULE 7.1.h.2**

Based upon the facts set forth herein, Defendants make this application to increase time and state: a) no other extensions of time have been sought with respect to the Second Amended Complaint, b) the reasons for this extension are set forth herein, and c) granting this extension would not effect any scheduled dates.

WHEREFORE, based upon the foregoing, Defendants respectfully request that this Court grant Defendants *Ex Parte* Motion Extending Time and enter an Order extending Defendants' deadline for filing a dispositive motion or responsive pleading to the Plaintiff's Complaint until June 19, 2006

Respectfully submitted,

CNMI ATTORNEY GENERAL'S OFFICE  
ON BEHALF OF DEFENDANTS CNMI, FORELLI,  
BUSH, COTTON AND BROWN

By   
Kristin D. St. Peter  
Assistant Attorney General  
Office of the Attorney General  
2<sup>nd</sup> Floor, Juan A Sablan Memorial Bldg.  
Caller Box 10007  
Saipan, MP 96950  
670-664-2341

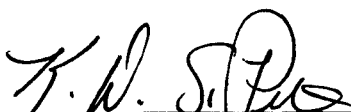
**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of the foregoing was served, via U.S. Mail, on the 10 day of April 2006, upon the following:

Robert D. Bradshaw  
Plaintiff, Pro Se  
P.O. Box 473  
1530 W. Trout Creek Road  
Calder, ID 83808

Jay Sorensen  
c/o Shanghai  
Post Office Box 9022  
Warren, MI 48090-9022  
Telephone: (86) 21 5083-8542  
Facsimile: (86) 21 5083-8542

Civille and Tang, PLLC  
330 Herman Cortez Ave, Suite 200  
Hagatna, Guam 96910  
Telephone: 671-472-8868  
Facsimile: 671-477-2511

  
\_\_\_\_\_  
Kristin D. St. Peter  
Assistant Attorney General

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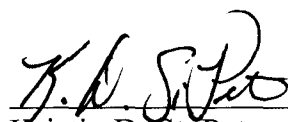
**DECLARATION OF KRISTIN D. ST. PETER  
IN SUPPORT OF EX PARTE MOTION  
EXTENDING TIME**

I, Kristin D. St. Peter, under penalty of perjury, declare as follow:

1. I am an individual currently residing on the Island of Saipan and employed as an Assistant Attorney General by the Commonwealth of the Northern Mariana Islands (“CNMI”) Attorney General’s Office.
2. I represent Defendants CNMI, Nicole Forelli, William Bush, Douglas Cotton and Pamela Brown in the above-entitled action.

- 1 3. Because of the voluminous nature of Plaintiff Bradshaw's complaint, Defendants
- 2 CNMI, Forelli, Bush, Cotton and Brown require additional time to file a dispositive
- 3 motion or responsive pleading to Plaintiff's Complaint.
- 4 4. Granting this extension request will not have any discernable effect on this
- 5 proceeding.
- 6 5. On April 10, 2006, I contacted Plaintiff Bradshaw telephonically and requested his
- 7 assent to extend Defendants' deadline to respond to Plaintiff's Second Amended
- 8 Complaint until June 19, 2006. Plaintiff Bradshaw agreed to this request.
- 9

10 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
11 knowledge. Signed on Saipan, CNMI this 10 day of April, 2006.

12  
13   
14 Kristin D. St. Peter